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15 *Attorneys for Plaintiff* MEDIATEK INC.
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17 UNITED STATES DISTRICT COURT
18 NORTHERN DISTRICT OF CALIFORNIA
19 OAKLAND DIVISION

20 MEDIATEK INC.

21 Plaintiff,

22 v.

23 FREESCALE SEMICONDUCTOR, INC.

24 Defendant.
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Civil Action No. 4:11-cv-05341 (YGR)

DECLARATION OF
MH SHIEH IN SUPPORT OF
FREESCALE SEMICONDUCTOR
INC.'S ADMINISTRATIVE MOTION
TO FILE UNDER SEAL

DEMAND FOR JURY TRIAL

1 I, MH Shieh, declare as follows:

2 1. I am an employee of MediaTek Inc. ("MediaTek"), plaintiff in the above-
3 captioned matter. My current job title is Special Assistant to the General Manager. I submit this
4 declaration in support of Freescale Semiconductor Inc.'s ("Freescale") Administrative Motion to
5 File Under Seal Freescale's Notice of Errata to its Motion to Exclude Certain Testimony of
6 Catherine M. Lawton ("Administrative Motion") pursuant to Local Rules 7-11 and 79-5. I have
7 personal knowledge of the facts set forth in this declaration and, if called to testify as a witness,
8 could and would do so competently.

9 2. Freescale's Administrative Motion seeks to have filed under seal confidential,
10 unredacted versions of Freescale's corrected Motion to Exclude Certain Testimony of Catherine
11 M. Lawton ("Freescale's Corrected Motion"). Freescale's Corrected Motion contains
12 information concerning MediaTek's acquisition of the patents-in-suit and patent licensing.

13 3. MediaTek does not publicly disclose information concerning its patent
14 acquisitions and licensing practices. Instead, MediaTek protects this information as a trade secret,
15 and takes steps to ensure that this information remains confidential, including marking the
16 information included in Freescale's Corrected Motion as "HIGHLY CONFIDENTIAL –
17 ATTORNEYS' EYES ONLY" when MediaTek produced this information in this action. If this
18 information were publicly disclosed, MediaTek's competitors could use the information in
19 Freescale's Corrected Motion to MediaTek's economic disadvantage by tailoring their
20 negotiation strategies regarding intellectual property transfers and licensing to exploit
21 MediaTek's practices.

22 4. The requested relief is narrowly tailored to protect the confidentiality of this
23 information. Only those portions of Freescale's Corrected Motion that describe the MediaTek's
24 practices regarding patent acquisitions and licensing are covered by Freescale's Administrative
25 Motion.

26 I declare under penalty of perjury under the laws of the United States that the foregoing is
27 true and correct.

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2 Dated: December 10, 2013
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4 *Meng-Hann Shieh*

5 MH Shieh
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